

**In The Matter Of:**

*In Re: Professional Fee Matters Concerning  
The Jackson Walker Law Firm*

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*David R. Jones  
September 19, 2024*

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*Behmke Reporting and Video Services, Inc.  
550 California Street, Suite 820  
San Francisco, California 94104  
(415) 597-5600*

<p style="text-align: right;">Page 29</p> <p>1 what you just said?</p> <p>2 He's asking to preserve the objections</p> <p>3 rather than asserting the objections under the Rules.</p> <p>4 <b>MS. STEELE:</b> Your Honor, I think our</p> <p>5 preference would be for Mr. Jones to assert the</p> <p>6 privilege to each question. Is that the question?</p> <p>7 <b>JUDGE RODRIGUEZ:</b> No.</p> <p>8 <b>MR. FINESTONE:</b> That's going to happen,</p> <p>9 Counselor. In a normal deposition we don't have the</p> <p>10 benefit of His Honor sitting here prepared to make</p> <p>11 evidentiary rulings. I would object to form and</p> <p>12 preserve and reserve all other objections for a future</p> <p>13 date and time. And I'm asking whether we have your</p> <p>14 agreement that it's going to proceed the same way.</p> <p>15 <b>MS. STEELE:</b> That's fine, Your Honor.</p> <p>16 We can agree to that. Thank you.</p> <p>17 <b>MR. FINESTONE:</b> One final procedural</p> <p>18 point, Your Honor.</p> <p>19 Perhaps in lawyerly fashion, I</p> <p>20 described the rights that I anticipate my client will</p> <p>21 assert today. I'd like for my client to be able --</p> <p>22 almost like a defined term in a corporate document,</p> <p>23 I'd like for my client to simply be able to say, "I'm</p> <p>24 declining to answer that" and for Your Honor and for</p> <p>25 the record to be clear, when my client says he's</p>	<p style="text-align: right;">Page 31</p> <p>1 <b>for the record?</b></p> <p>2 A. David Ronald Jones.</p> <p>3 <b>Q. What is your current residence?</b></p> <p>4 A. I don't know how to answer that.</p> <p>5 <b>Q. Where do you live?</b></p> <p>6 A. I have two homes.</p> <p>7 <b>Q. What are the addresses of your two homes?</b></p> <p>8 A. 6530 Rolla. 210 Ridge Lane.</p> <p>9 <b>Q. And where do you spend the majority of your</b></p> <p>10 <b>time living?</b></p> <p>11 A. I couldn't do that. That would be a guess.</p> <p>12 <b>Q. Where do you claim your homestead exemption?</b></p> <p>13 A. 210 Ridge Lane.</p> <p>14 <b>Q. Does anyone reside with you at 210 Ridge</b></p> <p>15 <b>Lane?</b></p> <p>16 <b>THE WITNESS:</b> Judge, how do you want to</p> <p>17 do the shorthand?</p> <p>18 <b>JUDGE RODRIGUEZ:</b> I haven't heard any</p> <p>19 objections.</p> <p>20 <b>THE WITNESS:</b> I'm declining to answer</p> <p>21 the question based upon the rights and privileges</p> <p>22 granted to me under the United States Constitution as</p> <p>23 well as the Texas Constitution. Do you want me to</p> <p>24 repeat that each and every time or --</p> <p>25 <b>JUDGE RODRIGUEZ:</b> We can make that a</p>
<p style="text-align: right;">Page 30</p> <p>1 declining to answer the question, the rights that he's</p> <p>2 asserting are the Fifth Amendment rights under the</p> <p>3 Constitution and the analogous rights under the Texas</p> <p>4 Constitution.</p> <p>5 <b>MS. STEELE:</b> Your Honor, I'm okay with</p> <p>6 the shorthand version of that, but I think there needs</p> <p>7 to be a clear record that the witness is indeed</p> <p>8 asserting the Fifth Amendment and any Texas</p> <p>9 Constitution --</p> <p>10 <b>JUDGE RODRIGUEZ:</b> We'll get that on the</p> <p>11 record. That's fine.</p> <p>12 Let's get started. Call your first</p> <p>13 witness.</p> <p>14 <b>MS. STEELE:</b> Thank you, Your Honor. I</p> <p>15 would call Mr. David R. Jones to the stand, please.</p> <p>16 <b>DAVID R. JONES,</b></p> <p>17 having been first duly sworn, testified as follows:</p> <p>18 <b>JUDGE RODRIGUEZ:</b> Ms. Steele, your</p> <p>19 witness.</p> <p>20 <b>EXAMINATION BY MS. STEELE</b></p> <p>21 <b>Q. Good morning, Mr. Jones. My name is Laura</b></p> <p>22 <b>Steele. I'm a trial attorney with the United States</b></p> <p>23 <b>Department of Justice, U.S. Trustee Program. Thank</b></p> <p>24 <b>you for being here this morning, Mr. Jones.</b></p> <p>25 <b>Could you please state your full name</b></p>	<p style="text-align: right;">Page 32</p> <p>1 defined, just "decline to answer" asserting your</p> <p>2 rights under the Fifth amendment.</p> <p>3 <b>THE WITNESS:</b> All right.</p> <p>4 <b>BY MS. STEELE:</b></p> <p>5 <b>Q. Mr. Jones, does anyone reside with you at</b></p> <p>6 <b>the Rolla Street property?</b></p> <p>7 A. I decline to answer.</p> <p>8 <b>Q. Are you the only owner of 210 Ridge Lane?</b></p> <p>9 A. I decline to answer.</p> <p>10 <b>Q. Are you the only owner of the Rolla Street</b></p> <p>11 <b>property?</b></p> <p>12 A. I decline to answer.</p> <p>13 <b>Q. How long have you lived at the 210 Ridge</b></p> <p>14 <b>Lane property?</b></p> <p>15 A. I decline to answer.</p> <p>16 <b>Q. How long have you lived at the Rolla</b></p> <p>17 <b>property?</b></p> <p>18 A. I decline to answer.</p> <p>19 <b>Q. Do you own any other properties other than</b></p> <p>20 <b>the two properties that we've discussed this morning</b></p> <p>21 <b>so far?</b></p> <p>22 A. I decline to answer.</p> <p>23 <b>Q. Mr. Jones, what is your highest level of</b></p> <p>24 <b>education?</b></p> <p>25 A. I decline to answer.</p>

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1 Q. And when did you learn?  
 2 A. I think I read about them. And I don't know  
 3 from where. But I've read somewhere that Jackson  
 4 Walker adjusted or comped so that nothing was  
 5 attributable to any case that I had. I know at some  
 6 point she was told she couldn't work on cases that I  
 7 presided over.  
 8 But I don't know when I learned that.  
 9 It was certainly after they had done it.  
 10 Q. Did Ms. Freeman generally confide in you  
 11 about, you know, things that troubled her at work, you  
 12 know, just frustrations with coworkers or supervisors  
 13 or anything like that?  
 14 A. No.  
 15 Q. Did you ever talk about her work at Jackson  
 16 Walker at home?  
 17 A. "Never" is a strong word, but as a matter of  
 18 practice, no.  
 19 Q. So you were completely unaware of what was  
 20 going on at Jackson Walker, I believe, March 6th to  
 21 the 8th, 2021?  
 22 A. What was going on on March 6th? I don't  
 23 know what you're referring to.  
 24 Q. Sure.  
 25 So Ms. Freeman had been called up by

1 A. That she had not seen me?  
 2 Q. Correct.  
 3 A. From when to when?  
 4 Q. So March 2020 through March 2021.  
 5 A. I mean, I'm sure she saw me on video for  
 6 hearings and stuff.  
 7 Q. Did she see you at home?  
 8 A. Ask the question again.  
 9 Q. Sure.  
 10 Did she see you at home in the period  
 11 of March 2020 through March 2021?  
 12 A. What are you referring to as home?  
 13 Q. Rolla Street.  
 14 A. I don't believe so.  
 15 Q. And where was she?  
 16 A. I don't know.  
 17 Q. Did you see her at other places?  
 18 A. I mean, one, you're asking me something that  
 19 happened a long time ago, and I don't want to give you  
 20 an incorrect answer. I just -- I don't know.  
 21 Q. Had she moved out of the Rolla house in  
 22 2021?  
 23 A. I'm going to decline to answer that  
 24 question.  
 25 Q. So Jackson Walker contacted Harvey and

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1 the firm and asked questions, and you were unaware  
 2 about that happening?  
 3 A. She was called up. You mean like somebody  
 4 called her on the telephone?  
 5 Q. Correct.  
 6 A. I have no memory of that.  
 7 Q. Mr. Jones, if you could go to [Exhibit 62](#). I  
 8 do appreciate your patience with this many exhibits.  
 9 I know it's cumbersome.  
 10 A. All right.  
 11 Q. So in September of 2021, Mr. Cowlshaw  
 12 received a letter from Harvey and Jarvis, which are  
 13 counsel for Holland & Knight, regarding the  
 14 allegations that had been made in the Van Deelen  
 15 letter.  
 16 Have you ever seen this letter before  
 17 today?  
 18 A. No.  
 19 Q. Did Jackson Walker at any point contact you  
 20 to confirm facts regarding your relationship with  
 21 Ms. Freeman before 2023?  
 22 A. I don't think so.  
 23 Q. Would it have been true if Ms. Freeman  
 24 represented that she had not seen you since the onset  
 25 of COVID through March 2021?

1 Jarvis and Holland & Knight for the purpose of seeking  
 2 what I believe to be some guidance as to -- to handle  
 3 the revelations that Ms. Freeman had made to them  
 4 about there having been a prior relationship.  
 5 A. Are you telling me to assume that as a fact?  
 6 Q. Yes.  
 7 A. Okay.  
 8 Q. Because you've never seen the letter, you  
 9 don't know anything about Harvey and Jarvis?  
 10 A. Well, I know who Holland & Knight is. It's  
 11 not Holland and Jarvis, but I know who Holland &  
 12 Knight is.  
 13 Q. I appreciate the correction. Thank you.  
 14 Harvey and Jarvis.  
 15 A. Holland & Knight.  
 16 Q. And Holland & Knight.  
 17 So Harvey and Jarvis are the two  
 18 attorneys who work for Holland & Knight?  
 19 A. I don't know that. I'll accept that.  
 20 Q. Okay. Thank you.  
 21 In 2021 in March, did you have any  
 22 further conversations with Ms. Freeman with regard to  
 23 your ethical duties to disclose the relationship?  
 24 A. Not that I know of. Or not that I remember.  
 25 She wouldn't have asked my advice anyway.